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Via E-mail (crottyNYSDChambers@nysd.uscourts.gov)

Hon. Paul A. Crotty, U.S.D.J.
United States District Court For The Southern
District of New York
500 Pearl Street, Courtroom 20-C
New York, New York 10007

Re: *Iftikhar Ahmad v. Hartford Life And Accident Insurance Company*
Civ. Act. No. 10 cv 4545(PAC)(MHD)
File No.: 02489-000081

23 JUN 2011
SO ORDERED:

HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

Dear Judge Crotty:

This office represents the defendant, Hartford Life And Accident Insurance Company ("Hartford"). We write on behalf of both parties to request an extension of the July 5, 2011 deadline to file motions for summary judgment. (Doc. Nos. 15 & 16).

By Order dated May 5, 2011, this Court ordered that the defendants produce Nurse Johanna Cobb for deposition. (Doc. No. 16). Nurse Cobb is located in Maitland, Florida. Plaintiff and Hartford's counsel have been working together to schedule the deposition of Nurse Cobb along with three other witnesses located in the Maitland, Florida area in an unrelated case to avoid the burden and expense of making two trips. As a result, the only dates that counsel and all four witnesses were available are July 28 and 29, 2011, which is after the current deadline to file summary judgment motions.

This is the fourth request for an extension of time. Two requests were made while the motion to compel was under consideration. (Doc. Nos. 14 & 15). Plaintiff joins in the request for this extension of time. This request for an adjournment does not affect any other previously scheduled dates.

We respectfully request that the Court issue an order granting the parties an extension of time to complete discovery up to and including August 5, 2011, and requiring the parties to file summary judgment motions on or before September 9, 2011.

Thank you for your consideration of this matter.

Respectfully submitted,

s/
John T. Seybert
Sedgwick LLP

cc: Scott M. Riemer, Esq. (via email)

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